

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LIANG WANG,

Plaintiff,

vs.

THE PHILHARMONIC SYMPHONY SOCIETY
OF NEW YORK, INC. AND ASSOCIATED
MUSICIANS OF GREATER NEW YORK, LOCAL
802, AMERICAN FEDERATION OF MUSICIANS,

Defendants.
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: Case No.
: 1:24-cv-03356 (AS)
:
: [rel. 1:24-cv-03348 (AS)]
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**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Local Rule 56.1 Statement of undisputed facts, the Declaration of Liang Wang with attached exhibits, the Declaration of Alan S. Lewis with attached exhibits, the Memorandum of Law in opposition to Defendants' motions to dismiss and in support of Plaintiff's partial motion for summary judgment, and upon all prior proceedings and pleadings herein, Plaintiff Liang Wang will move this Court, at a time and place to be directed by the Court, for an order pursuant to Fed. R. Civ. P. 56, granting partial summary judgment on his first claim against Defendant Associated Musicians of Greater New York, Local 802, American Federation of Musicians (breach of duty of fair representation), and on his second claim against Defendant The Philharmonic-Symphony Society of New York, Inc. (breach of the collective bargaining agreement pursuant to Section 301 of the Labor Management Relations Act) on the ground that there are no material facts in dispute and that Wang is entitled to judgment as a matter of law.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Joint Status Letter, ECF#33, answering papers, if any, shall be served by September 18, 2024.

Dated: New York, New York
July 29, 2024

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